



**U.S. Department of Justice**

*United States Attorney  
Southern District of New York*

*The Silvio J. Mollo Building  
One Saint Andrew's Plaza  
New York, New York 10007*

January 21, 2020

By ECF

The Honorable J. Paul Oetken  
United States District Judge  
Southern District of New York  
Thurgood Marshall U.S. Courthouse  
40 Foley Square  
New York, New York 10007

Re: United States v. Parnas, et al., 19 Cr. 725 (JPO)

Dear Judge Oetken:

Earlier this evening, the Government filed a letter in which the Government represented to the Court that the Government first unlocked Mr. Parnas's iPhone 11 in early December 2019, and that on December 3, 2019, the Government asked Mr. Bondy for a hard drive, which he delayed producing until December 19, 2019. Nonetheless, twenty minutes after the Government's letter was filed, Mr. Bondy filed a two-page missive in which he accused the Government of lying about the date the iPhone was unlocked and extracted. It was unlocked and extracted on December 3, 2019.

Respectfully submitted,

GEOFFREY S. BERMAN  
United States Attorney for the  
Southern District of New York

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cc: Defense Counsel (by ECF)